

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KAREEM RAY SENISES, Debtor	:	CHAPTER 13
	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
KAREEM RAY SENISES,	:	
Respondent	:	CASE NO. 1-23-bk-00736-HWV

TRUSTEE'S OBJECTION TO THE SIXTH AMENDED CHAPTER 13 PLAN  
FILED ON APRIL 27, 2025

AND NOW, this 9<sup>th</sup> day of May 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Trustee avers that Debtor's Plan is not feasible based upon the following:
  - a. The Plan is underfunded relative to claims to be paid. The Plan would need to pay approximately \$43,557.00 to be funded as drafted. It seems that arrears to Amerisave Mortgage Corp. may be paid directly out of sale proceeds, but the Plan has Trustee paying those arrears.
2. Trustee provides notice to the Court as to the ineffectiveness of Debtor's Chapter 13 Plan for the following reason:
  - a. The Plan refers to other documents not attached to the Plan in violation of the local rules.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 9<sup>th</sup> day of May 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Leonard Zagurskie, Esquire  
Law Office of Leonard Zagurskie, Jr.  
110 West Main Avenue  
1<sup>st</sup> Floor  
Myerstown, PA 17067

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee